

From: Hepp, Michael (ECY)
Sent: Thursday, May 19, 2011 10:39 AM
To: SW Permit Comments
Cc: Duncan, David Joseph (ECY)
Subject: LID for Eastern Washington Municipal Stormwater Permit and Manuals

I have one general comment:

In many years of experience in water quality complaint response I have found that lack of proper maintenance (not design) is a cause for failure of stormwater Best Management Practices (BMPS) and treatment structures. Low Impact Development often involves plants or materials BMPs that require more active maintenance than simpler conventional stormwater treatment. The increased maintenance needs of LIDs with the responsibility for maintenance being held by commonly indifferent home owner associations is a recipe for failure. LID projects need to have a formal long term funding source to ensure proper maintenance is done if they are to be used. Additionally, the local stormwater authority needs to have an active inspection program to ensure LIDs are performing as designed and are being maintained.

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